

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**GREGORY J. HALPERN,**

**Plaintiff,**

**v.**

**Civil No.: 1:25-cv-03637**

**CHIQUITA BROOKS-LASURE,  
SAMANTHA POWER, GOLI  
SHEIKHOESLAMI, XAVIER BECERRA,  
LLOYD J. AUSTIN III, ROBERT M.  
CALIFF, MIGUEL CARDONA, DENISE  
CARTER, KILOLO KIJAKAZI, MARTIN  
J. O'MALLEY, CAROLYN COLVIN,  
GEORGE SOROS, BILL GATES, DOES 1-  
100, AND OTHER NAMED DEFENDANTS  
IN THEIR PERSONAL CAPACITIES,**

**Defendants.**

**[PROPOSED] ORDER GRANTING MOTION FOR LEAVE  
TO CONDUCT JURISDICTIONAL DISCOVERY**

Upon consideration of Plaintiff's Motion for Leave to Conduct Limited Jurisdictional Discovery as to Defendant Goli Sheikholeslami's citizenship for diversity purposes, the Opposition thereto, and the entire record herein,

IT IS HEREBY ORDERED that the Motion is GRANTED.

Plaintiff is permitted to serve limited discovery requests focused solely on the issue of Defendant Goli Sheikholeslami's domicile at the time of removal, including but not limited to:

1. Voter registration history;
2. Driver's license or state ID issuance;
3. Lease agreements or property records;
4. Tax filings and address records indicating principal residence.

Defendant shall respond to such discovery within 14 days of service.

SO ORDERED.

Dated: \_\_\_\_\_, 2025

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Hon. Jeffrey I. Cummings  
United States District Judge

## **CERTIFICATE OF SERVICE**

Pursuant to LR 5.5, I hereby certify that on May 6, 2025, I caused copies of the foregoing Plaintiff's Consolidated Supplemental Reply (1) In Support of Motion to Remand for Lack of Subject Matter Jurisdiction (Removal Void Ab Initio), and (2) In Support of Motion to Strike and Motion for Sanctions Under Rule 11, **together with all accompanying filings and documents**, to be served on Defendant through her attorneys, by U.S. mail in accordance with Fed. R. Civ. P. 5(b) and by e-mail at the addresses below:

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Gregory J. Halpern